United States District Court					
District of Massachusetts					
Cantral Division					

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TRIF Company
Plaintiff

V.

Chris Morris d/b/a International
Housewares, Frank Stoegarar d/b/a
Worldwide Marketing, Zia Biao Xu and
Zhi Xiong Xu d/b/a World Link, LLC

C.A. No. -04-30194-MAP

MOTION TO EXTEND TIME FOR SERVICE OF PROCESS

Now comes the Plaintiff TRIF Company to request an enlargement of time of sixty days to March 25, 2005 to serve Plaintiff's First Amended Complaint on defendants Zia Biao Xu and Zhi Xiong Xu d/b/a World Link, LLC and Frank Stoegarar d/b/a Worldwide Marketing. Plaintiff's complaint was filed on September 25, 2004. On September 28, 2004 Plaintiff mailed copies of the complaint to the last known business address of these defendants in New York and Los Angeles requesting waivers of service of summons pursuant to rule 4. The third defendant, Chris Morris, d/b/a/ International Housewares was personally served in September in Springfield, Massachusetts.

Defendants Worldwide Marketing and World Link, LLC did not respond to the original complaint. The complaint was amended on December 20, 2004.

The last known business address for World Link, LLC is a New York City massage parlor owned by the defendants where service was attempted on four occasions. The Plaintiff on January 13, 2005 learned that this defendant has another address in Los Angeles where the company operates and where service will be attempted. Personal service has also been attempted on Frank Stoegarar d/b/a Worldwide Marketing at his last known business address in Los Angeles but no proof of service has yet been returned to this office. None of the defendants has answered the complaint. However, the Plaintiff intends to voluntarily dismiss Chris Morris d/b/a International Housewares from this action pursuant to a settlement agreement.

Wherefore, Plaintiff seeks up to and including March 25, 2005 to complete service of process on the named defendants.

Respectfully submitted by,

Plaintiff,

By its Attorneys,

Harris K. Weiner, Esq. # 551981 Law Office of Jeffrey B. Pine

321 South Main Street

Suite 302

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Phone: (401) 351-8200 Fax: (401) 351-9032

CERTIFICATION

I, the undersigned, hereby certify that on this 14 day of January 2005, I mailed a true copy of the foregoing *Motion to Extend Time for Service of Process* to Chris Morris d/b/a International Housewares, 6601 Ventor Ave. Suite 305 Ventor, NJ 08406

Leslie A. Odom